

From: Daniel W. Juffernbruch
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To: AC90.comments
Subject: ultimate parent entity rule comments

The proposed identification of the ultimate parent entity is circular and unnecessarily burdensome for small and micro entity startups. One typical situation I see often is an individual who has invented an invention and also owns his own corporation. These corporations are closely held by the inventor alone or occasionally with a wife or other family member or associate as part investor. Sometimes these corporations are so closely held the inventor does not even assign it because he is the defacto President, CEO, COO, etc., but even if it was assigned, it doesn't matter. It is silly to even need to take a position on who is the ultimate parent entity in this situation. The definition is circular because if the company holds it, it is for the benefit of the inventor and if the inventor holds it, it is for the benefit of the company. These closely held small and micro entities aren't trying to hide anything. They are just trying to avoid unnecessary legal steps and entanglements. They have nothing to hide but don't want the hassle and risk of abandonment for failing to properly comply with an unnecessary requirement. Please carve out these types of situations from your proposed rule.

Best Regards,

Dan

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